

STEPHEN L. DEAN, a Minor,
et al,

Plaintiff,

vs.


AMOS GARRETT,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

ANSWER

The Defendant, for answer to the Complaint says, that he is
not guilty of the matters therein averred.


Attorney for Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

STEPHEN L. DEAN, a Minor, et al,
Plaintiff,

vs.

AMOS GARRETT,
Defendant.

ANSWER

Filed this 9th day of February 1943
R. A. Magney
Clark Register

LLOYD A. MAGNEY
Attorney
Foley, Alabama.

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

YOU ARE HEREBY COMMANDED to summon AMOS GARRETT, to appear within thirty days from the service of this writ in the Circuit Court to be held for said County at the place of holding the same, then and there to answer the Complaint of STEPHEN LEE DEAN, a minor, by MILTON A. DEAN, his father and next friend.

Witness my hand this the 1st day of January, 1943.

R. S. Duck
Clerk.

STEPHEN LEE DEAN, a minor,
By MILTON A. DEAN, his father
and next friend,
PLAINTIFF,

VS.

AMOS GARRETT, DEFENDANT.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW.

1.

The Plaintiff claims of the Defendant the sum of FIVE THOUSAND (\$5000.00) DOLLARS damages, for that heretofore on to-wit, May 3, 1942, the Plaintiff was riding as a guest in an automobile driven by the Defendant along Highway # 31, a public highway, at a point approximately five miles south of Evergreen in Escambia County, Alabama; that at said time and place the Defendant willfully and wantonly injured the Plaintiff by so operating said automobile as to cause it to run off the road and overturn, and as a proximate result thereof the Plaintiff was injured as follows: he was scratched and bruised; his head was crushed; he suffered concussion of the brain; he was otherwise injured; he was permanently injured.

The Plaintiff alleges that his damages and injuries were the

proximate result of the negligence of the Defendant in and about the operation of the automobile which he was driving and in which Plaintiff was riding.

2.

The Plaintiff claims of the Defendant FIVE THOUSAND (\$5000.00) DOLLARS, as damages, that on to-wit: May 23, 1942, the Defendant wantonly or willfully injured the Plaintiff by causing or allowing an automobile which he was driving on or along Highway # 31 at a point approximately five miles south of Evergreen in Escambia County, Alabama, and in which the Plaintiff was riding as a guest, to leave the highway and overturn thereby severely injuring the Plaintiff as follows: he was scratched and bruised; his head was crushed; he suffered concussion of the brain; he was otherwise injured; he was permanently injured.

The Plaintiff alleges that his damages and injuries were the proximate result of the negligence of the Defendant in and about the operation of the automobile which he was driving and in which Plaintiff was riding.

BEEBE & HALL

By: [Signature]
Attorneys for Plaintiff.

Plaintiff demands a trial by jury

*Beebe & Hall
by H. M. Hall
Att'y for Pltff*

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Received in Sheriff's Office
this 2 day of Jan., 1943
W. R. STUART, Sheriff

Executed Jan 13th 1943
by serving copy of within Summons and
Complaint on

Amos Garrett

W. R. Stuart

Sheriff

By Deputy Sheriff

March 13, 1943.

We the jury find for
the plaintiff and give
his damages \$750.00

Foreman

W. O. Baker

RECORDED

STEPHEN LEE DEAN, ETC

Plaintiff,

vs

AMOS GARRETT,

Defendant.

SUMMONS AND COMPLAINT,

Filed January 8th, 1943

R. D. Beck
Clerk

864

CIVIL SUBPOENA—ORIGINAL—In case witness shall wish to charge for attendance, he shall produce to the Clerk in term this Subpoena, or within five days after adjournment of Court, else he shall be barred. Times Prtg. Co., Bay Minette.

THE STATE OF ALABAMA
BALDWIN COUNTY

} **-CIRCUIT COURT**
Case No. 798. April. Term, 1943

To any Sheriff of the State of Alabama, GREETING:

You are hereby commanded to summon J C Hyde. Rfd Evergreen. Ala.

Highway 31.

to be found in your County, at the instance of the Deft.

to be and appear before the honorable, the Judge of the Circuit Court of Baldwin County, at the Court House there-

of, by 8 30. o'clock of the forenoon, on the 13th day of April., 1945

and from day to day and term to term of said Court until discharged by law, then and there to testify, and

the truth to say, in a certain cause pending, wherein Stephen Lee Dean. Plaintiff

and Amos Garrett. Defendant.

Herein fail not and have you then and there this Writ.

Given under my hand and seal, this 29th day of March. 1943

 Clerk

Received in office this _____ day of

194

SHERIFF

I have executed this writ

by serving all
 3/30/43

ORIGINAL

No. 798.

Page

THE STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Stephen Lee Dean.

Plaintiff

VS.

Amos Garrett,

Defendant

CIVIL SUBPOENA

Issued this 29th day of

March.

1943

R. L. DeLoach

Clerk.

M. R. Moore

SHERIFF

CIVIL SUBPOENA—ORIGINAL—In case witness shall wish to charge for attendance, he shall produce to the Clerk in term this Subpoena, or within five days after adjournment of Court, else he shall be barred. Times Prtg. Co., Bay Minette.

THE STATE OF ALABAMA
BALDWIN COUNTY

} Case No. 798 April Term, 1943
CIRCUIT COURT

To any Sheriff of the State of Alabama, GREETING:

You are hereby commanded to summon Mrs. W. C. M. Gowan
Loyley, L. P. Comstock, Robertsdale
if to be found in your County, at the instance of the Defendant

to be and appear before the honorable, the Judge of the Circuit Court of Baldwin County, at the Court House there-

of, by 8:30 o'clock of the forenoon, on the 13th day of April, 1943

and from day to day and term to term of said Court until discharged by law, then and there to testify, and

the truth to say, in a certain cause pending, wherein Stephen Dean Plaintiff

and Mr. Amos Garrett Defendant.

Herein fail not and have you then and there this Writ.

Given under my hand and seal, this 7th day of April, 1943

R. S. Duke Clerk

Received in office this _____ day of

194

SHERIFF

I have executed this writ

7th April 1943
by serving copy
on Mrs W. S. M. G. G. G.
& L. J. Cornstock

SHERIFF

ORIGINAL

No. 798

Page

THE STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Stephen Dean

Plaintiff

VS.

Amos Garrett

Defendant

CIVIL SUBPOENA

Issued this

7th

day of

April

1943

R. S. Duck

Clerk.

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT
Case No. 22 798, April Term, 1943.

To any Sheriff of the State of Alabama, GREETING:

You are hereby commanded to summon Dr Holly

if to be found in your County, at the instance of the Pltf.

to be and appear before the honorable, the Judge of the Circuit Court of Baldwin County, at the Court House there-

of, by 8 30 clock of the forenoon, on the 13th day of April, 1943

and from day to day and term to term of said Court until discharged by law, then and there to testify, and

the truth to say, in a certain cause pending, wherein Stephen Lee Dean Plaintiff

and Amos Garrett Defendant.

Herein fail not and have you then and there this Writ.

Given under my hand and seal, this 7th day of April, 1943

R. S. Duck Clerk

ORIGINAL

Received in office this _____ day of

194

SHERIFF

I have executed this writ

4/10/43

Serving in full

SHERIFF

No. 798,

Page _____

THE STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Stephen Lee Dean.

Plaintiff

VS.

Amos Garrett,

Defendant

CIVIL SUBPOENA

Issued this 7th day of

April

1943

R. Duck

Clerk.

CIVIL SUBPOENA—ORIGINAL—In case witness shall wish to charge for attendance, he shall produce to the Clerk in term this Subpoena, or within five days after adjournment of Court, else he shall be barred. Times Ptg. Co., Bay Minette.

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT
Case No. 798. April Term, 194 3

To any Sheriff of the State of Alabama, GREETING:

You are hereby commanded to summon Clifford Hyde.

if to be found in your County, at the instance of the Pltf,

to be and appear before the honorable, the Judge of the Circuit Court of Baldwin County, at the Court House there-

of, by 8 30 o'clock of the forenoon, on the 13th day of April, 194 3

and from day to day and term to term of said Court until discharged by law, then and there to testify, and

the truth to say, in a certain cause pending, wherein Stephen Lee Dean Plaintiff

and Amos Garrett. Defendant.

Herein fail not and have you then and there this Writ.

Given under my hand and seal, this 7th day of April, 194 3

 Clerk

Received in office this _____ day of

194

SHERIFF

I have executed this writ

by returning all
4/8/43

W. A. Moore
SHERIFF

ORIGINAL

No. 798

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THE STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Step^{an} Lee Dean.

Plaintiff

VS.

Amos Garrett.

Defendant

CIVIL SUBPOENA

Issued this 7th day of

April.

1943

R. D. Duck

Clerk.